

SC NAACP v. Alexander,
Case No. 3:21-cv-03302-MGL-TJH-RMG

EXHIBIT C

**PORTIONS OF THIS DEPOSITION HAVE BEEN
SUBMITTED TO THE COURT FOR IN CAMERA
REVIEW PURSUANT TO THE CONSENT
CONFIDENTIALITY ORDER
(ECF NO. 123)**

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

THE SOUTH CAROLINA STATE CONFERENCE OF
THE NAACP, et al.,
Plaintiffs,

vs. CASE NO. 3:21-cv-03302-MBS
TJH-RMG

THOMAS C. ALEXANDER, et al.,
Defendant.

VTC

DEPOSITION OF: WALLACE HERBERT JORDAN, JR.
VOLUME II - Pages 225 through 444
(Appearing by VTC)

DATE: July 21, 2022

TIME: 10:03 a.m.

LOCATION: Nexsen Pruet Law Firm
1230 Main Street, 7th Floor
TAKEN BY: Counsel for the Plaintiffs
REPORTED BY: Susan M. Valsecchi, CRR
Registered Professional Reporter
(Appearing by VTC)

1 Q. Did you try and make sure that all of
2 the districts were contiguous?

3 A. Yes.

4 Q. Did you, to the best of your ability,
5 try to make sure that the districts were compact?

6 A. Yes.

7 Q. Did you, as you understood communities
8 of interest, attempt to keep them whole?

9 A. Yes.

10 Q. And did you consider incumbency in the
11 adoption of congressional districts?

12 A. Yes, it was a consideration, as
13 outlined in the document.

14 Q. And in Roman Numeral IX, priority of
15 criteria, if I might paraphrase, does it say that
16 all of these considerations, criteria, are to be
17 considered but none of them can conflict with
18 sections 1, 2, 3 or 4?

19 A. Yes, if you -- if, for instance 7, 8,
20 9, if one of those had an issue that competed with
21 1, 2, 3, 4, the 1, 2, 3, 4 would be controlling.

22 Q. Okay. And if you will look at Roman
23 Numeral X, can you read that for me?

24 A. "Public input."

25 "The Redistricting Ad Hoc Committee

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Wallace H. Jordan, Jr.

Date

1 SC State Conference Of The NAACP v. Alexander, Et Al.

2 Wallace H. Jordan, Jr. - Volume 2 (#5327842)

3 ACKNOWLEDGEMENT OF DEPONENT

4 I, Wallace H. Jordan, Jr., do hereby declare that I
5 have read the foregoing transcript, I have made any
6 corrections, additions, or changes I deemed necessary as
7 noted above to be appended hereto, and that the same is
8 a true, correct and complete transcript of the testimony
9 given by me.

10
11 _____
12 Wallace H. Jordan, Jr.

_____ Date

13 *If notary is required

14 SUBSCRIBED AND SWORN TO BEFORE ME THIS

15 _____ DAY OF _____, 20____.

16
17
18 _____
19 NOTARY PUBLIC
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